

29 November 1999
464C-4831-JWH

REC'D
DEC 01 1999
RESP

Ms. Kendra Kennell
U. S. Environmental Protection Agency
Region VII
ARTD/RESP
901 North 5th Street
Kansas City, Kansas 66101



Dear Ms. Kennell;

This letter is in response to the notice of noncompliance, dated November 17, 1999, that was issued to the McDonnell Douglas Corporation, a wholly owned subsidiary of The Boeing Company, Tract IV facility in St. Louis, Missouri. As requested, following is a description of actions taken to correct the areas of noncompliance listed.

1. Hazardous waste on outside of two 55 gallon drums

The material observed on the outside of the drums was removed immediately following completion of the inspection on November 16. David Whiting, the EPA inspector, verified this corrective action on November 17. Workers responsible for placing the waste into the drums were instructed on the requirements for placing hazardous wastes in approved containers and directed to ensure that no waste material is on the outside of the drums.

2. Past storage of ignitable hazardous waste less than 50 feet from the property line

The waste storage/containment structure will be moved east of its present location to be 50 feet from the property line. Relocation of the storage area will be completed by December 17, 1999. No ignitable waste will be placed into the storage structure until it is relocated.

3. Contingency plan does not include addresses of emergency coordinators

The home addresses of the emergency coordinators have been added to the contingency plan. Attachment I of our SPCC Plan listing emergency coordinators is enclosed.

Please advise whether additional actions or information are required.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joe Haake".

Joseph W. Haake, Group Manager
Environmental and Hazardous Materials Services
Dept. 464C, Bldg. 220, Mailcode S221-1400
(314) 232-6941



ATTACHMENT I

EMERGENCY COORDINATORS--RCRA CONTINGENCY PLAN

Regulations governing the hazardous waste storage facilities require that an Emergency Coordinator and Alternates be identified by name. The following persons have primary responsibility for incidents involving hazardous waste storage facilities, and should be contacted internally via "911" in case of emergencies or at office telephone/pager numbers for routine work. "Off duty" phone numbers are provided for use by external regulatory authorities.

Primary RCRA Emergency Coordinator

Elmer Dwyer: (314) 232-3319 (0630-1500 M-F), (314) 940-0522 (off duty)
Home Address: 3112 Hawk Drive, St. Charles, MO 63301

Dept. 464C, Environmental and Hazardous Materials Services
Personnel use pager 9-318-1703

Alternate RCRA Emergency Coordinator

Joseph Haake: 232-3319 (0730-1600 M-F), (314) 344-4317 (off duty)
D464C/220/S221-1400
Home Address: 4243 Cameo Drive, Bridgeton, MO 63044

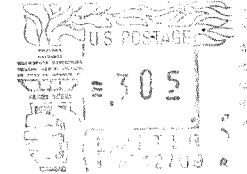
Second Alternate

Bryan Kury: 234-0652 (0730-1600 M-F), (314) 240-4317(off duty)
D464C/220/S221-1400
Home Address: 15 Fawnlake Drive, St. Peters, MO 63376

The Boeing Company
P. O. Box 516
St. Louis MO 63166-0516
Joe Haake
S221-1400



PRESORT
FIRST CLASS MAIL



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Ms. Kendra Kennell
U.S. Environmental Protection Agency
Region VII
ARTD/RESP
901 North 5th Street
Kansas City, KS 66101

AUMF 66101

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

NOV 29 1999

TO: Facility Name: McDonnell Douglas Corp. Tract IV
Address: 5775 Campus Parkway
Hazelwood, MO 63642
EPA ID Number: MO D000818971 Date: 11/17/99

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation

Description of Violation

40 CFR 265.173(b)
10 CSR 25-5.262(1)
40 CFR 265.176
10 CSR 25-5.262(2)(c)(6)

Hazardous waste on outside of two 55 gallon drums.
Per storage of ignitable hazardous waste less
than 50' from property line.

40 CFR 265.52(d)
10 CSR 25-5.262(1)

Contingency plan does not include addresses of
emergency coordinator.

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII

ARTD/RESP
901 N. 5th St.
Kansas City, KS 66101
ATTN: Kendra Kennell

If you have any questions about this Notice or wish to discuss your response, you may call me at
(319) 338-6459, or Kendra Kennell (Compliance Officer) at
(913) 551-7136.

This Notice prepared by David N. Whiting Date: 11/17/99

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name:

Signature:

Title:

Bryan E. Quay

Bryan E. Quay

Manager, Environmental Compliance

Date: 11/17/99